

## **REMARKS**

Claims 1-32 are pending in the application. Claims 1-32 were rejected. Claims 1, 8, 14, 22, 27 and 30 were amended; no new matter has been added. Applicants respectfully request reconsideration of the rejections set forth in the Office Action dated June 12, 2007 in view of the preceding amendments and following remarks.

Applicants thank the Examiner for the courtesy extended during the personal interview with Applicants' representative on November 6, 2007. During this interview, the rejections under U.S.C. §102 and §103 were discussed.

### *In the Claims*

Claims 1, 14, 27 and 30 have been amended to add horizontal and vertical three-dimensional features in accordance with one embodiment in the specification; no new matter has been added. Support for the amendments can be found on page 9 line 13 to page 16 line 21 and in Figures 2B-2E, for example.

### *Rejections Under 35 U.S.C. §102/§103*

Claims 1, 2, 5-7, 9-12, 14, 15, 18-21, 23-28, 30 and 3 were rejected under 35 U.S.C. 102(e) as being unpatentable over U.S. Patent Application No. 2003/0176214 to Burak et al. (referred to herein as 'Burak').

Claims 3, 4 and 17 were rejected were rejected under 35 U.S.C. 103(a) as being unpatentable over Burak.

Claims 8, 22, 29 and 32 were rejected were rejected under 35 U.S.C. 103(a) as being unpatentable over Burak in view of U.S. Patent No. 6,954,223 to Miyazawa et al. (referred to herein as 'Miyazawa').

Claim 13 was rejected were rejected under 35 U.S.C. 103(a) as being unpatentable over Burak in view of U.S. Patent No. 5,655,961 to Acres et al. (referred to herein as 'Acres').

The independent claims have been amended to recite a combination of limitations that are not taught or suggested by the art of record. The amended claims now recite "a display unit capable of displaying three-dimensional images, said display unit comprising a display screen having a plurality of display pixels and a lenticular screen coupled with said display screen, wherein said lenticular screen is configured to provide nine perspective views that include a

combination of three horizontal perspective views and three vertical perspective views” and “wherein said controller is programmed to receive image data relating to a combination of the nine perspective views of said image, said nine perspective views being interlaced to form said image when displayed simultaneously”. Method claim 27 also recites “converting pixel or sub-pixel image data for the game into the nine perspective views that include the combination of three horizontal views and three vertical views, wherein the pixel or sub-pixel conversion occurs horizontally and vertically in relation to a lenticule.”

These limitations are: a) not taught or suggested by the art of record, and b) not obvious in view of the art of record.

Burak does not teach or suggest the added combination of limitations. Burak provides a brief overview of different 3-D devices, with minimal detail for each. Miyazawa also fails to teach or suggest these limitations. Miyazawa describes four horizontal images to provide horizontal parallax for a viewer’s left and right (horizontal) eyes. (see col. 4 lines 55-62). Miyazawa is silent on vertical lenticles, vertical lenticle image processing, and any need or desire for vertical lenticles. Therefore, the art of record, even in combination, fails to teach the combination of limitations in the amended independent claims.

The amended claims are also not obvious in view of the art of record. Miyazawa is primarily concerned with decreasing processing time for stereoscopic image data. The amended claims would add unnecessary processing efforts and inefficiencies to the systems of Miyazawa (and Burak). Miyazawa’s main goal is to avoid such inefficiencies and added processing efforts. Notably, relative to Miyazawa, the amended claims would: a) decrease processing speed per frame, b) increase the amount of processing per frame, and c) increase processing time. Applicants respectfully point to MPEP 2141.02, which states: A reference must be taken in its entirety, including those portions that teach away from the claims and argue against obviousness. Also, Miyazawa’s horizontal parallax would not benefit from the amended claims. Further, the amended claims would also decrease the resolution available per view, and thus degrade the images and video output of Burak and Miyazawa. Again, “a reference must be taken in its entirety, including those portions that teach away from the claims and argue against obviousness”.

Applicants, therefore, respectfully submit that a prima facie case of obviousness has not been made. According to the Manual of Patent Examining Procedure (M.P.E.P.) § 2143:

To establish a *prima facie* case of obviousness, three basic criteria must be met. **First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings.** Second, there must be a reasonable expectation of success. **Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the Applicants disclosure.

In this instance, there is **no suggestion or motivation in the references** to modify the references or to combine reference teachings to meet the claimed combination of limitations. Also, **the prior art references, even when combined, fail to teach or suggest all the claim limitations.**

For at least these reasons, amended independent claims 1, 14, 27 and 30 are allowable over Burak and Miyazawa. The remaining art of record does not cure the deficiencies in Burak and Miyazawa.

Claims 2-13, 15-26, 28-29 and 31-32 each depend either directly from independent claims 1, 14, 27 and 30, respectively, and are therefore respectfully submitted to be patentable over the art of record for at least the reasons set forth above with respect to the independent claim. In addition, the dependent claims recite additional elements which when taken in the context of the claimed invention further patentably distinguish the art of record.

Withdrawal of the rejections under 35 USC §102 and §103 is therefore respectfully requested.

Applicants believe that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,  
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